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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No. 07-5944 (JST)  
MDL No. 1917

This Document Relates to:

*Sears, Roebuck & Co., and Kmart Corporation  
v. LG Electronics, Inc., et al.*, Case No. 11-cv-  
5514 (SC)

**SEARS' AND KMART'S  
ADMINISTRATIVE MOTION TO  
ESTABLISH A PROCEDURE TO  
STREAMLINE TRIAL AND  
MINIMIZE UNFOUNDED  
EVIDENTIARY OBJECTIONS**

With this administrative motion, Sears, Roebuck and Co. and Kmart Corporation (collectively, "Plaintiffs") propose a procedure that would substantially lessen the time needed for trial and also minimize the number of evidentiary objections pending before the Court.

The procedure is simple: if a party is required to play deposition testimony to authenticate and admit a trial exhibit and the Court rules that the testimony is sufficient to admit the exhibit into evidence, then the time spent playing the testimony would count against the objecting party, rather than the proponent of the exhibit.

1 This procedure is borne out in Plaintiffs' efforts to shorten our trial presentation (and taking  
2 to heart this Court's suggestion that the parties make every reasonable effort to streamline the  
3 presentation of evidence at trial). LG initially objected to every exhibit on Plaintiffs' exhibit list but  
4 one.<sup>1</sup> Plaintiffs believe that they can overcome a large number of these objections with deposition  
5 testimony. However, Plaintiffs estimate that this testimony (the sole purpose of which is to admit  
6 trial exhibits) would require five to six hours of trial time.<sup>2</sup> Thus, to the extent that Plaintiffs are not  
7 required to play this testimony, it would have a substantial impact on the time needed to present  
8 their case to the jury.

9 For several weeks, Plaintiffs have attempted to reach an agreement with LG to eliminate  
10 unfounded objections. Plaintiffs have done so in order to avoid wasting valuable trial time (and  
11 unnecessarily torturing the jury) with testimony needed solely to admit documents into evidence.  
12 On October 20, 2016, following a meet and confer with LG's counsel, Plaintiffs sent LG's counsel  
13 a list of 125 exhibits along with an extract of the foundational testimony for each exhibit. Plaintiffs  
14 requested a prompt response in order to provide the Court at the upcoming status conference with a  
15 best estimate of the number of witnesses and attendant time it would need for its case in chief.  
16 Although the parties continue to talk, LG has yet to take a position as to whether it will agree to  
17 admissibility of any of these trial exhibits without forcing Plaintiffs to play authenticating  
18 deposition testimony to the jury. To be clear, Plaintiffs are merely taking the matter of foundation  
19 off the table where the matter of admissibility is not genuinely in doubt. To move the ball forward,  
20 Plaintiffs have brought this motion regarding time allocation. A simple ruling from the Court as to  
21 the allocation of time used to admit trial exhibits suggests itself as a reasonable way to address the  
22 issue.

23  
24  
25 <sup>1</sup> The parties have been able to reach agreement on the admission of a number of  
26 documents produced by Chunghwa, that Chunghwa previously stipulated to be admissible. *See* ECF  
27 No. 2912. In case the Court is curious, the one exhibit to which LG does not object is an  
28 organizational chart for Sears.

<sup>2</sup> The relevant foundational testimony is provided on Exhibit A.

The Court has wide discretion to make pretrial evidentiary rulings. The Court also has wide discretion in the allocation of trial time.<sup>3</sup> Given the Court schedule, trial time in this case will be at a premium. Counting the time against the party that does not stipulate to the admissibility of a document that is thereafter admitted will discipline the process. It is not only fair to both sides, it is a sensible, easily managed procedure designed to promote efficiency.

### **CONCLUSION**

To promote the efficient use of trial time, and to curtail frivolous foundational objections, Plaintiffs respectfully request the Court to enter an order that charges the time used to authenticate and lay the foundation to admit a document that is subsequently admitted into evidence against the objecting party time on the trial time clock.

Dated: October 27, 2016

Respectfully submitted,

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By: 


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<sup>3</sup> The Ninth Circuit has noted that “[t]rial courts have broad authority to impose reasonable time limits. Such limits are useful to prevent undue delay, waste of time, or need less presentation of cumulative evidence.” *McSherry v. City of Long Beach*, 423 F.3d 1015, 1023 (9th Cir. 2005) quoting *Navellier v. Sletten*, 262 F.3d 923, 941 (9th Cir. 2001).

**CERTIFICATE OF SERVICE**

On October 27, 2016, I caused a copy of the foregoing Sears' and Kmart's Administrative Motion to Establish a Procedure to Streamline Trial and Minimize Unfounded Evidentiary Objections to be electronically filed via the Court's Electronic Case Filing System, which constitutes service in this action pursuant to the Court's order of September 29, 2008.

By:   
William J. Blechman

551440.1

# Exhibit A

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
2	653	653		SDCRT-0086211	SDCRT-0086212	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
3	654	654		SDCRT-0086221	SDCRT-0086223	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
4	657	657		SDCRT-0086248	SDCRT-0086248	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
5	659	659		SDCRT-0086253	SDCRT-0086255	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
6	665	665	5608	SDCRT-0086487	SDCRT-0086488	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
7	703	703		SDCRT-0086485	SDCRT-0086486	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
8	707	707		SDCRT-0069574	SDCRT-0069575	
9	711	711		SDCRT-0068849	SDCRT-0068851	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
10	713	713		SDCRT-0005830	SDCRT-0005842	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
11	801	801		MTPD-0038856	MTPD-0038859	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
12	802	802		MTPD-0035375	MTPD-0035377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
12 cont'd	802 Contt'd	802 Contt'd		MTPD-0035375	MTPD-0035377	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
13	808	808		MTPD-0492286	MTPD-0492289	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
14	913	913		MTPD-0276412	MTPD-0276416	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
14 Cont'd	913 Cont'd	913 Cont'd		MTPD-0276412	MTPD-0276416	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
15	917	917		MTPD-0576483	MTPD-0576483	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
16	1286	1286				
17	1403	1403		PHLP-CRT-077930	PHLP-CRT-077932	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
18	1416	1416		MTPD-0497049	MTPD-0479050	
19	1418	1418		MTPD-0479660	MTPD-0479661	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
20	1424	1424		MTPD-0517734	MTPD-0517736	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
21	1505	1505		SDCRT-0086532	SDCRT-0086536	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
22	1515	1515		SDCRT-0091742	SDCRT-0091742	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
23	1533	1533		HDP-CRT00025646	HDP-CRT00025647	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
24	1535	1535		HDP-CRT00025568	HDP-CRT00025569	
25	1536	1536		HDP-CRT00051345	HDP-CRT00051345	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
26	1565	1565		HDP-CRT00026082	HDP-CRT00026803	
27	1568	1568		HDP-CRT00048694	HDP-CRT00048694	
28	1569	1569		HDP-CRT00048797	HDP-CRT00048797	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
29	1571	1571		HDP-CRT00026189	HDP-CRT00026191	
30	1579	1579		HDP-CRT00026313	HDP-CRT00026315	
31	1580	1580		HDP-CRT00049270	HDP-CRT00049272	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
32	1581	1581		HDP-CRT00023360	HDP-CRT00023361	
33	1585	1585		HDP-CRT00023625	HDP-CRT00023629	
34	1595	1595		HDP-CRT00049232	HDP-CRT00049232	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
35	1597	1597		HDP-CRT00049281	HDP-CRT00049281	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
36	1603	1603		HDP-CRT00026272	HDP-CRT00026273	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
37	1604	1604		HDP-CRT00056189	HDP-CRT000561890	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
38	1756	1756	3304	TSB-CRT-00035350	TSB-CRT-00035352	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
39	1757	1757		TSB-CRT-00042493	TSB-CRT-00042495	
40	1785	1785		TSB-CRT-00041721	TSB-CRT-00041724	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
41	1786	1786		TSB-CRT-00041746	TSB-CRT-00041749	
42	1795	1795		MTPD-0479738	MTPD-0479738	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
43	1796	1796		MTPD-0479739	MTPD-0479741	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
44	1797	1797		MTPD-0410018	MTPD-0410018	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
45	1799	1799		MTPD-0493549	MTPD-0493550	
46	1800	1800		MTPD-0493551	MTPD-0493551	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
47	1853	1853	2338	PHLP-CRT-098241	PHLP-CRT-098243	
48	1854	1854		PHLP-CRT-014816	PHLP-CRT-014818	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
49	1859	1859		PHLP-CRT-007941	PHLP-CRT-007942	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
50	1860	1860		PHLP-CRT-7891	PHLP-CRT-7891	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
51	1866	1866		PHLP-CRT-014272	PHLP-CRT-014274	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
51 Cont'd	1866	1866		PHLP-CRT-014272	PHLP-CRT-014274	
52	1867	1867		PHLP-CRT-012646	PHLP-CRT-012660	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
53	1869	1869		PHLP-CRT-005637	PHLP-CRT-005637	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
54	1885	1885		SDCRT-0086416	SDCRT-0086418	
55	1889	1889		SDCRT-0086563	SDCRT0086566	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
56	1895	1895		SDCRT-0086632	SDCRT-0086633	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
57	1896	1896		SDCRT-0086641	SDCRT-0086645	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
58	1908	1908		SDCRT-0002585	SDCRT-0002587	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
59	1909	1909	5602	SDCRT-0002588	SDCRT-0002589	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
59 Cont'd	1909 Cont'd	1909 Cont'd	5602	SDCRT-0002588	SDCRT-0002589	
60	1931	1931		SDCRT-0051456	SDCRT-0051459	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
61	1932	1932		MTPD-0423675	MTPD-0423677	
62	1933	1933		MTPD-057683	MTPD-057683	
63	1934	1934		MTPD-0400574	MTPD-0400576	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
64	1938	1938		MTPD-0533137	MTPD-0533142	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
65	1946	1946		MTPD-0042738	MTPD-0042740	
66	2023	2023		TAEC-CRT-00090127	TAEC-CRT-00090128	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
67	2034	2034		MTPD-0523236	MTPD-0523238	
68	2035	2035		MTPD-0518803	MTPD-0518805	
69	2036	2036		MTPD-0082527	MTPD-0082530	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
70	2069	2069		SDCRT-0005813	SDCRT-0005813	
71	2070	2070		SDCRT-0079381	SDCRT-0079382	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
72	2071	2071		SDCRT-0063870	SDCRT-0063871	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
72 Cont'd	2071 Cont'd	2071 Cont'd		SDCRT-0063870	SDCRT-0063871	
73	2077	2077		SDCRT-0007280	SDCRT-0007281	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
74	2079	2079	5603	SDCRT-0007173	SDCRT-0007173	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
75	2080	2080		SDCRT-0002423	SDCRT-0002423	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
76	2082	2082		SDCRT-0005818	SDCRT-0005818	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
76 Cont'd	2082 Cont'd	2082 Cont'd		SDCRT-0005818	SDCRT-0005818	
77	2083	2083		SDCRT-0091364	SDCRT-0091366	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
78	2084	2084		SDCRT-0007609	SDCRT-0007610	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
79	2087	2087		SDCRT-0093913	SDCRT-0093914	
80	2336	2336		PHLP-CRT-089918	PHLP-CRT-089918	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
81	2338	2338	1853	JLJ-00005511	JLJ-00005513	
82	2349	2349		PHLP-CRT-091465	PHLP-CRT-091470	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
83	2360	2360		JLJ-00003191	JLJ-00003193	
84	2382	2382		HDP-CRT00027174	HDP-CRT00027176	
85	2386	2386		HDP-CRT00049291	HDP-CRT00049291	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
86	2445	2445		SDCRT-0180438	SDCRT-0180438	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
87	3300	3300		TSB-CRT-0041620	TSB-CRT-00041623	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
87 Cont'd	3300	3300		TSB-CRT-0041620	TSB-CRT-00041623	
88	3304	3304	1756	TSB-CRT-00035350	TSB-CRT-00035352	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
889	3336	3336		SDCRT-0006799	SDCRT-0006801	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
89 Cont'd	3336 Cont'd	3336 Cont'd		SDCRT-0006799	SDCRT-0006801	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
90	3339	3339		SDCRT-0088635	SDCRT-0088660	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
90 Cont'd	3339 Cont'd	3339 Cont'd		SDCRT-0088635	SDCRT-0088660	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
91	3341	3341		PHLP-CRT-020159	PHLP-CRT-020162	
92	3401	3401		MTPD-0423651	MTPD-0423651	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
93	3406	3406		MTPD-0518160	MTPD-0518162	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
94	3407	3407		MTPD-0518689	MTPD-0518693	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
95	3408	3408		MTPD-0251219	MTPD-0251219	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
95 Cont'd	3408 Cont'd	3408 Cont'd		MTPD-0251219	MTPD-0251219	
96	3819	3819		SDCRT-006285	SDCRT-006286	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
97	3841	3841		SDCRT-0002488	SDCRT-0002489	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
98	5209	5209		SDCRT-0002506	SDCRT-00022510	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
99	5217	5217		PHLP-CRT-093375	PHLP-CRT-093377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
99 Cont'd	5217 Cont'd	5217 Cont'd		PHLP-CRT-093375	PHLP-CRT-093377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
99 Cont'd	5217 Cont'd	5217 Cont'd		PHLP-CRT-093375	PHLP-CRT-093377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
99 Cont'd	5217 Cont'd	5217 Cont'd		PHLP-CRT-093375	PHLP-CRT-093377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
99 Cont'd	5217 Cont'd	5217 Cont'd		PHLP-CRT-093375	PHLP-CRT-093377	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
100	5219	5219		JLJ-00003116	JLJ-00003116	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
101	5220	5220		JLJ-00001259	JLJ-00001260	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
101 Cont'd	5220 Cont'd	5220 Cont'd		JLJ-00001259	JLJ-00001260	
102	5222	5222		JLJ-0003167	JLJ-0003168	
103	5223	5223		TSB-CRT-00035366	TSB-CRT-00035366	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
104	5601	5601		SDCRT-0002584	SDCRT-0002584	
105	5602	5602	1909	SDCRT-0002588	SDCRT-0002589	
106	5813	5813		TDA01360	TDA01361	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
107	6111	6111		ME 00109690	ME 00109694	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
107 Cont'd	6111 Cont'd	6111 Cont'd		ME 00109690	ME 00109694	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
107 Cont'd	6111 Cont'd	6111 Cont'd		ME 00109690	ME 00109694	
108	6121	6121		ME 00109966	ME 00109966	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
108 Cont'd	6121 Cont'd	6121 Cont'd		ME 00109966	ME 00109966	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
108 Cont'd	6121 Cont'd	6121 Cont'd		ME 00109966	ME 00109966	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
109	7190	7190		PHLP-CRT-159928	PHLP-CRT-159929	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
110	7203	7203		PHLP-CRT-163389	PHLP-CRT-163391	
111	7408	7408		TAEC-CRT-00054831	TAEC-CRT-00054848	



	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
112	7411	7411		TAEC-CRT-00096971	TAEC-CRT-00097007	
113	7413	7413		TAEC-CRT-00066846	TAEC-CRT-00066848	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
114	7501	7501				
115	7537	7537		TSB-CRT-00042334	TSB-CRT-00042336	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
116	7538	7538		TSB-CRT-00036875	TSB-CRT-00036875	
117	7540	7540		TSB-CRT-00042610	TSB-CRT-00042612	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
118	7545	7545	1787	TSB-CRT-00041862	TSB-CRT-00041863	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
119	7548	7548		TSB-CRT-00036557	TSB-CRT-00036557	
120	7549	7549	1422	MTPD-0486917	MTPD-0486919	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
121	8108	8108		TCE-CRT 0020593	TCE-CRT 0020594	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
122	8110	8110		TCE-CRT 0022275	TCE-CRT 0022276	
123	8138	8138		TSA-CRT00188014	TSA-CRT00188014	
124	8139	8139		TCE-CRT0021601	TCE-CRT0021602	

	A	B	C	D	E	F
1	Depo Exhibit No.	Trial Exhibit No.	Dup	Begin Bates No.	End Bates No.	Authenticating Testimony
125	8344	8344		ME00072237	ME00072237	
126	8345	8345		ME00072341; ME00030631	ME00030637	